

Exhibit 11

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - -

5 IN RE: NATIONAL : MDL NO. 2804
6 PRESCRIPTION OPIATE :
7 LITIGATION :

8 -----

9 : CASE NO.
10 THIS DOCUMENT : 1:17-MD-2804
11 RELATES TO ALL CASES:

12 : Hon. Dan A.
13 : Polster

14 - - -

15 Friday November 16, 2018

16 - - -

17 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
18 CONFIDENTIALITY REVIEW

19

20 - - -

21

22 Videotaped deposition of
23 JOHN HASSLER, taken pursuant to notice,
24 was held at Golkow Litigation Services,
25 One Liberty Place, 1650 Market Street,
26 Suite 5150, Philadelphia, Pennsylvania
27 19103, beginning at 10:43 a.m., on the
28 above date, before Amanda Dee
29 Maslynsky-Miller, a Certified Realtime
30 Reporter.

31

32 - - -

33

34 GOLKOW LITIGATION SERVICES
35 877.370.3377 ph | 917.591.5672 fax
36 deps@golkow.com

37

1 branded and their generics, unless it was
2 specifically cited as a site-specific or
3 ANDA-specific policy.

4 Q. Did Teva USA, at any time,
5 have a similar type of policy with regard
6 to its generic products?

7 MS. HILLYER: Similar to
8 what?

9 MR. CRAWFORD: To U.S.
10 policy on promotion,
11 nonpromotional and off-label
12 interactions and materials.

13 MS. HILLYER: Objection.
14 Vague. I don't know what you mean
15 by "similar."

16 MR. CRAWFORD: I mean, I'm
17 just trying to find out if they
18 have any policies that deal with
19 those topics with regard to their
20 generic products.

21 MS. HILLYER: Objection to
22 form.

23 You can answer if you
24 understand.

1 THE WITNESS: They had -- I
2 can't speak to the time period.
3 They had an approval process for
4 promotional materials to be
5 reviewed by legal, regulatory and
6 the commercial group that was
7 creating the announcements. I
8 don't remember whether they're
9 referenced in some of these
10 overarching policies or not.

11 BY MR. CRAWFORD:

12 Q. Let's break it down.

13 Did they have any policy at
14 Teva with regard to its generic products
15 on off-label interactions?

16 MS. HILLYER: At what point
17 in time?

18 MR. CRAWFORD: Any time.

19 THE WITNESS: The code of
20 conduct would have prohibited
21 off-label interactions for anyone
22 underneath Teva USA.

23 BY MR. CRAWFORD:

24 Q. Any other sales and

1 marketing type --

2 A. Any promotional, off-label
3 interactions.

4 Q. Any other sales or marketing
5 type policies or procedures that governed
6 off-label interactions at Teva USA for
7 its generic products?

8 A. Not that I'm aware of. It
9 just wasn't a practice that they would
10 talk about the therapeutic information in
11 the product. They typically just ran
12 with the brand name, the dosage strength,
13 and the availability of the product.

14 Q. As you sit here today, I
15 know this is a sampling you provided me,
16 Exhibit-8, but can you think of any other
17 policies or procedures that you can
18 identify regarding any of the topics in
19 Question 10 that aren't listed here?

20 MS. HILLYER: Objection to
21 form. It's pretty broad.

22 THE WITNESS: No, there are
23 none that come to mind.

24 BY MR. CRAWFORD: